

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED:
DONNIE SMITH, ABID STEVENS and MAURICE QUINN	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (robbery which interferes with interstate commerce – 1 count)
	:	18 U.S.C. § 924(c)(1) (carrying and using a firearm during and in relation to a crime of violence – 1 count)
	:	18 U.S.C. § 922g(1) (unlawful possession of a firearm)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. RD Grocery, located at 152 East Sharpnack Street, Philadelphia, Pennsylvania, was a convenience store business that engaged in interstate commerce by providing for sale commodities produced and transported from other states to Pennsylvania, and sold to customers.

2. On or about March 22, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DONNIE SMITH,
ABID STEVENS and
MAURICE QUINN**

obstructed, delayed and affected commerce and the movement of articles and commodities in

commerce, by robbery, and attempted to do so, and aided and abetted the same, in that defendants DONNIE SMITH, ABID STEVENS, and MAURICE QUINN unlawfully took and obtained, \$100 in United States currency and a firearm, that is, a Glock 26, 9mm semi-automatic handgun, bearing serial number BCXX649, loaded with eight live rounds of ammunition, from employees of RD Grocery and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to their person and property, that is, by pointing firearms, threatening and controlling the victim employees, and stealing money and a firearm.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 22, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DONNIE SMITH,
ABID STEVENS and
MAURICE QUINN**

knowingly used, carried, and brandished, and aided and abetted the use, carrying, and brandishing of, a firearm, that is, two black semiautomatic handguns, and a Glock 26, 9mm semi-automatic pistol, bearing serial number BCXX649, loaded with eight live rounds of ammunition, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section § 1951(a), as charged in Count One.

In violation of Title 18, United States Code, Section 924(c)(1) and (2).

COUNT THREE

THE GRAND JURY CHARGES THAT:

On or about March 22, 2019, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DONNIE SMITH,

possessed in and affecting interstate commerce a firearm and ammunition, that is, a Glock 26, 9mm semi-automatic pistol, bearing serial number BCXX649, loaded with eight live rounds of ammunition, having previously been convicted in a court of the Eastern District of Pennsylvania and the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, and did so knowingly.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE No. 1

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

**DONNIE SMITH,
ABID STEVENS and
MAURICE QUINN**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such violations, including, but not limited to:

- a. A Glock 26, 9mm semi-automatic pistol, bearing serial number BCXX649,
and eight live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

NOTICE OF FORFEITURE No. 2

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1951(a), set forth in this indictment, defendant

**DONNIE SMITH,
ABID STEVENS and
MAURICE QUINN**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations, including, but not limited to, the sum of \$100.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

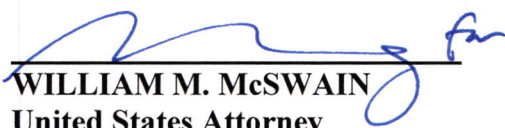
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:

FOREPERSON



WILLIAM M. McSWAIN
United States Attorney